

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION

ORIGINAL

AMEREN TRANSMISSION COMPANY OF  
ILLINOIS

Petition for a Certificate of Public Convenience and  
Necessity, pursuant to Section 8-406.1 of the Illinois  
Public Utilities Act, and an Order pursuant to  
Section 8-503 of the Public Utilities Act, to  
Construct, Operate and Maintain a New High  
Voltage Electric Service Line and Related Facilities  
in the Counties of Adams, Brown, Cass,  
Champaign, Christian, Clark, Coles, Edgar, Fulton,  
Macon, Montgomery, Morgan, Moultrie, Pike,  
Sangamon, Schuyler, Scott and Shelby, Illinois.

Docket No. 12-0598

Rehearing

**Initial Brief of Justin Ramey and Ann Raynolds**  
**12/30/2013**

**I. Introduction**

My name is Justin Ramey and my name is Ann Raynolds. Our property is  
Located at 1236 e 1000 North Road Taylorville, Illinois, 62568. This address is  
located on ATXI's proposed alternate route 2 from Pawnee to Pana. We are  
testifying on behalf of ourselves, Justin Ramey and Ann Raynolds. From this point  
forward, "we" and "us" shall represent Justin Ramey and Ann Raynolds. We became  
intervenors on February 8, 2013. We are in full support of Staffs proposed route from  
Pawnee to Mt. Zion via Kincaid and believe it to be the least cost option and best  
alternative route for this segment of the Illinois Rivers Transmission Project (based on  
twelve criteria to 27 evaluate routes set by Commission).

While we maintain our support of Staffs proposed route from Pawnee to Mt.  
Zion via Kincaid as the best alternative, we also understand that a Pawnee to Mt.  
Zion via Pana route may be selected if sufficient evidence (based on the

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COMMISSION

Commission's twelve criteria<sup>1</sup>) is presented to include it as part of the Illinois Rivers Transmission Project. In the event that a Pawnee to Mt. Zion via Pana route is found necessary by the Commission, we believe that we have sufficiently established the necessity of the Raynolds/Ramey segment as part of ATXI's alternate route 2 between Pawnee and Pana if this route is to meet the Commission's twelve criteria for purposes of evaluating routes. We believe that without the inclusion of the following Raynolds/Ramey proposed segment option, ATXI's alternate route 2 from Pawnee to Pana fails to fully represent a least cost configuration that adequately addresses the Commission's twelve criteria<sup>2</sup>. In response to this, our recommended segment option for this route is shown as Exhibit 1.1<sup>3</sup> and is hereafter referred to as the Raynolds/Ramey segment. The relevant portion of ATXI's Alternate Route 2 from Pawnee to Pana was depicted under this name on the Illinois Rivers Transmission website as of January 3, 2013<sup>4</sup> and will hereafter be referred to as ATXI's Alternate Route 2. ATXI's Alternate Route 2, without the Raynolds/Ramey segment modification, runs roughly west to east from Illinois 48 to a corner structure approximately 0.5 miles east of 1250 East Road. Along this west to east segment, ATXI's alternate route 2 transects an existing 345 kV line and then parallels 1000 North Road for approximately 2.23 miles between 1075 East Road (a short segment road connecting 1025 North and 1000 North Road) and 0.5 miles east of 1250 East Road. ATXI's alternate route 2 utilizes a corner structure 0.5 miles east of 1250 East Road and turns south to parallel an existing 138 kV line for approximately 1 mile between 1000 North Road and 900 North road where it again intersects the existing 345 kV line (ATXI's route parallels the 138 kV line for approximately 0.82 miles before it continues on to 900 North Road).

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<sup>1</sup>Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>2</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>3</sup> Raynolds/Ramey Segment exhibit 1.1

<sup>4</sup> Ameren Illinois Rivers Project proposed Routes Christian County

<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.

The Raynolds/Ramey segment would eliminate 2 transmission line spans of ATXI's alternate route 2: one 2.78 mile span along 1000 North Road, and one 1 mile span that parallels the 138 kV line between 1000 North road and 900 North Road.

As shown in exhibit 1.1, the Raynolds/Ramey segment would instead, intersect and parallel ATXI's existing 345 kV transmission line for 2.94 miles between the northwest quarter of T12N, R2W, section 17 and the southeast quarter of T12N, R2W, section 15 where it would rejoin ATXI's proposed alternate route 2.

In its current configuration, we believe that ATXI's alternate route 2 from Pawnee to Pana fails to fully represent a least cost configuration that adequately addresses the Commission's twelve criteria<sup>5</sup>. However, we believe that, through the utilization of Commission's twelve criteria<sup>6</sup>, we have adequately established the superiority of the Raynolds/Ramey segment when compared to the respective portion of ATXI's alternate route 2. Therefore, if the Raynolds/Ramey segment option was approved for the respective portion of ATXI's alternate route 2, we would then believe the route to meet the Commission's twelve criteria<sup>7</sup> and only then, would we be in full support of the ATXI alternate route 2.

In the event that the Illinois Commerce Commission rules in favor of ATXI's alternate route 2 from Pawnee to Pana and in the event this ruling does not include the proposed Raynolds/Ramey segment as described above, we find it necessary to enter the following stipulation:

We request that the centerline of Illinois Rivers Transmission Line does not pass within 400ft of any property line associated with the Raynolds/Ramey residence at 1236 E 1000 North Road, Taylorville IL 62568.

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<sup>5</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>6</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>7</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

While we maintain our support of Staffs proposed route from Pawnee to Mt. Zion via Kincaid as the best alternative, we also understand that a Pawnee to Mt. Zion via Pana route may be selected if sufficient evidence (based on the Commission's twelve criteria<sup>8</sup>) is presented to include it as part of the Illinois Rivers Transmission Project. In the event that a Pawnee to Mt. Zion via Pana route is found necessary by the Commission, we believe that we have sufficiently established the necessity of the Reynolds/Ramey segment as part of ATXI's alternate route 2 between Pawnee and Pana if this route is to meet the Commission's twelve criteria for purposes of evaluating routes.

## **II. Legal Standard**

### **III. Project Connection through Kincaid versus Pana**

We are in full support of Staffs proposed route from Pawnee to Mt. Zion via Kincaid and believe it to be the least cost option and best alternative route for this segment of the Illinois Rivers Transmission Project (based on twelve criteria to evaluate routes set by Commission).<sup>9</sup>

## **IV. Rehearing Routes**

### **A. Meredosia-Pawnee**

1. Length of Line
2. Difficulty and Cost of Construction
3. Difficulty and Cost of Operation and Maintenance
4. Environmental Impacts
5. Impacts on Historical Resources
6. Social and Land Use Impacts
7. Number of Affected Landowners and other Stakeholders
8. Proximity to Homes and Other Structures
9. Proximity to Existing and Planned Development
10. Community Acceptance
11. Visual Impact
12. Presence of Existing Corridors

### **B. Location of Mt. Zion Substation**

### **C. Pawnee – Mt. Zion**

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<sup>8</sup>Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>9</sup>Final Order, Twelve criteria for purposes of evaluating proposed routes, August 20, 2013, p.15

## **1. Pawnee – Mt. Zion via Kincaid**

- a. Length of Line
- b. Difficulty and Cost of Construction
- c. Difficulty and Cost of Operation and Maintenance
- d. Environmental Impacts
- e. Impacts on Historical Resources
- f. Social and Land Use Impacts
- g. Number of Affected Landowners and other Stakeholders
- h. Proximity to Homes and Other Structures
- i. Proximity to Existing and Planned Development
- j. Community Acceptance
- k. Visual Impact
- l. Presence of Existing Corridors

## **2. Pawnee-Mt. Zion via Pana**

### **a. Pawnee-Pana (including Ramey/Raynolds Option)**

#### **i. Length of Line**

The Raynolds/Ramey segment is 2.94 miles long; 0.84 miles shorter than ATXI's proposed alternate route 2.

#### **ii. Difficulty and Cost of Construction**

The Raynolds/Ramey segment would be the least cost option for this portion of ATXI's proposed alternate route 2 and the inclusion of the Raynolds/Ramey segment would reduce the total cost associated with ATXI's alternate route 2. The difficulty and cost of construction for the Raynolds/Ramey segment would be less than the respective portion of ATXI's alternate route 2 due to: shorter line length, the utilization of an existing transmission line corridor, the necessity of fewer transmission line structures, and ATXI's ability to maximize pole spacing on an undeveloped/nonresidential route. The Raynolds/Ramey segment may also be less expensive and easier to construct due to the elimination of 1 corner structure (located approximately 0.5 miles east of 1250 East Road).<sup>10</sup> Exhibit 1.1 would suggest fewer trees along the proposed Raynolds/Ramey segment as well, which could further reduce project costs while expediting project completion.

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<sup>10</sup> Ameren Illinois Rivers Project proposed Routes Christian County  
<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.

We believe the Reynolds/Ramey segment delivers a significant level of cost reduction for the Illinois Rivers Transmission Project and for Ameren Illinois area customers by providing the least cost option for this portion of ATXI's proposed alternate route 2.

**iii. Difficulty and Cost of Operation and Maintenance**

We do not believe there would be an appreciable difference in the difficulty and cost of operations and maintenance between the Reynolds/Ramey segment and AXTI's alternate route 2.

**iv. Environmental Impacts**

We are unaware of any significant impacts regarding the environmental criterion for either route. However, as stated previously, an existing, already disturbed transmission line corridor would be utilized as part of the Reynolds/Ramey segment. Use of the existing corridor would limit or eliminate the need to impact new and undisturbed habitat. Also, as stated previously, exhibit 1.1 would suggest that fewer trees would need to be removed along the proposed Reynolds/Ramey segment.

**v. Impacts on Historical Resources**

The Reynolds/Ramey residence and barn located at 1236 E 1000 North Road were built in 1880 and plans are in place to restore these structures as potential candidates for the National Register of Historic Places in Illinois.

**vi. Social and Land Use Impacts**

Other than residences, the land use in this area is primarily agricultural. 1000 E North Road is a narrow, one lane country road that will require ATXI support structures to be located on cultivated acres. Said cultivated acres do not currently have any transmission lines or support structures on them and related farming operations are currently uninhibited by transmission line structures of any kind.

Although the Raynolds/Ramey segment would also require support structures on cultivated acres, these acres have already been impacted by support structures present as part of existing 138 kV and 345 kV transmission lines. Current farming operations on the cultivated acres of the Raynolds/Ramey segment have also already been impacted due to the presence of the existing transmission lines. No transmission structures on the Raynolds/Ramey segment should be required in fields that are currently without transmission line development. Furthermore, the Raynolds/Ramey segment should affect fewer cultivated acres than ATXI's alternate route 2 due to: shorter line length, the need for fewer structures and the ability of ATXI to maximize pole spacing due to the reduction or elimination of close proximities to existing overhead lines and residences.

**vii. Number of Affected Landowners and other Stakeholders and viii.**

**Proximity to Homes and other Structures**

The primary benefit of the Raynolds/Ramey segment is that it would avoid 5 affected residences by moving the 345 kV transmission line significantly further from 5 homes located directly on or near 1000 North Road. More specifically, ATXI's alternate route 2<sup>11</sup> is proposed to pass very close (less than 150ft.) to at least 2 of the 5 affected residences on 1000 North Road, one being the Raynolds/Ramey residence located at 1236 East 1000 North Road. This type of impact to residences should be avoided without question when there are other segment options available on this portion of ATXI's alternate route 2 that can provided the same 345 kV service at a lower cost while also more efficiently meeting the Commissions twelve criteria.<sup>12</sup>

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<sup>11</sup>Ameren Illinois Rivers Project proposed Routes Christian County  
<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.

<sup>12</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

The Raynolds/Ramey segment provides both of these benefits by providing a lower cost alternative while simultaneously meeting the Commission's twelve criteria<sup>13</sup> far more comprehensively than ATXI's alternate route 2. The superiority of the Raynolds/Ramey segment is further strengthened by the fact that there are no affected residences within 1000 ft. of the Raynolds/Ramey segment.

#### **ix. Proximity to Existing and Planned Development**

We are unaware of any additional existing or planned development along either route.

#### **x. Community Acceptance and xi. Visual Impact**

The Raynolds/Ramey segment would move the proposed ATXI alternate route 2 transmission line a significant distance south, away from 5 residences on or near 1000 North Road. As previously stated, ATXI's alternate route 2 is proposed to pass very close (less than 150 ft.) to at least 2 of the 5 affected residences on 1000 North Road<sup>14</sup>. Many safety and health concerns are associated with and have been expressed through public comment in regard to transmission structures and lines located within 150 ft. of residences. By locating the 345 kV transmission line on the Raynolds/Ramey segment, concerns related to safety and health impacts would be eliminated for residences located on this portion of the Illinois Rivers Transmission Project. Furthermore, both the direct and indirect property devaluation of 5 residences on or near 1000 North Road would be completely avoided on the Raynolds/Ramey segment and the visual impact associated with the Illinois Rivers Transmission Project would be virtually eliminated for said residences.

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<sup>13</sup> Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

<sup>14</sup> Ameren Illinois Rivers Project proposed Routes Christian County

<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.



The Raynolds/Ramey segment will also parallel existing transmission lines in an undeveloped area that lies at least 1000 ft. from any residence in Christian County. Increased distances from the Illinois Rivers Transmission line and the fact that transmission lines are already present along the Raynolds/Ramey segment would suggest that no property devaluation will be imposed to residences on the Raynolds/Ramey segment. The utilization of an existing transmission line corridor in an undeveloped/nonresidential area would also support our argument that the visual impact associated with high voltage transmission lines on the Raynolds/Ramey segment is already present as part of the existing transmission line system and this visual impact will not be significantly compounded by the location of the Raynolds/Ramey segment. As previously stated above, both the Raynolds/Ramey segment and ATXI's alternate route 2 would need to utilize cultivated acres as part of their routes. However, we also stated above that the Raynolds/Ramey segment should affect fewer cultivated acres than ATXI's alternate route 2 due to: shorter line length, the need for fewer structures and ATXI's ability to maximize pole spacing due to the reduction or elimination of close proximities to existing overhead lines and residences. 8 landowners would be affected by the Raynolds/Ramey segment. It is our understanding that all 8 landowners would have been affected by ATXI's alternate routes and therefore, it is believed that all have been contacted as potentially affected parties. 2 of the landowners on the Raynolds/Ramey segment and their tenant farmer support the paralleling of existing transmission lines including the existing transmission lines on the Raynolds/Ramey segment. With the above reasoning in mind, we are confident to conclude that the Raynolds/Ramey

segment would yield greater community acceptance than ATXI's alternate route 2.

## **xii. Presence of Existing Corridors**

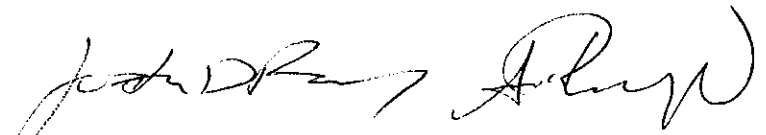
As previously described, the Raynolds/Ramey segment would utilize an existing transmission line corridor and parallel 2.94 miles of existing transmission line. Although ATXI has expressed reliability concerns associated with paralleling existing transmission lines<sup>15</sup>, ATXI's own proposed alternate route 2 between Pawnee and Pana will require paralleling for more than 17 miles<sup>16</sup> of existing transmission line. As previously stated, the Raynolds/Ramey segment would eliminate 0.82 miles of ATXI's alternate route 2 where it is proposed to parallel a 138 kV line between 1000 North Road and 900 North Road. The Raynolds/Ramey segment would, however, parallel 2.94 miles of existing 345 kV line but the segment would only effectively add 2.12 miles of parallel transmission line to ATXI's alternate route 2. While we understand ATXI's concerns with paralleling transmission lines, we believe that these concerns are fully negated by the fact that ATXI's proposed alternate route 2 also includes more than 17 miles of new line that would parallel existing 138 kV and 345 kV line along an existing corridor. In fact, the majority of these 17 plus miles of ATXI alternate route 2 lines are proposed to parallel upstream portions of the same transmissions line proposed to be paralleled in the Raynolds/Ramey segment. This fact further negates ATXI's reliability concerns with paralleling existing transmission lines on the Pawnee to Pana route.

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<sup>15</sup>Second Revised Rebuttal testimony of Donell Murphy ATXI exhibit 13.0 (2d. Rev), p.24

<sup>16</sup>Ameren Illinois Rivers Project proposed Routes Christian County

<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.



**b. Pana – Mt. Zion**

- i. Length of Line
- ii. Difficulty and Cost of Construction
- iii. Difficulty and Cost of Operation and Maintenance
- iv. Environmental Impacts
- v. Impacts on Historical Resources
- vi. Social and Land Use Impacts
- vii. Number of Affected Landowners and other Stakeholders
- viii. Proximity to Homes and Other Structures
- ix. Proximity to Existing and Planned Development
- x. Community Acceptance
- xi. Visual Impact
- xii. Presence of Existing Corridors

**D. Mt. Zion – Kansas**

1. Length of Line
2. Difficulty and Cost of Construction
3. Difficulty and Cost of Operation and Maintenance
4. Environmental Impacts
5. Impacts on Historical Resources
6. Social and Land Use Impacts
7. Number of Affected Landowners and Stakeholders
8. Proximity to Homes and Other Structures
9. Proximity to Existing and Planned Development
10. Community Acceptance
11. Visual Impact
12. Presence of Existing Corridors

**V. Certificate for Other Substations**

**A. Resolved**

1. Kansas Substation Site
2. Sidney Substation Site
3. Rising Substation Site

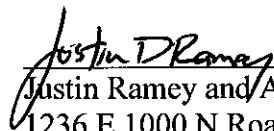
**B. Contested**

1. Ipava Substation Site
2. Pana Substation Site

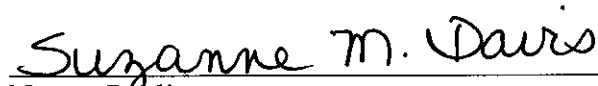
STATE OF ILLINOIS :  
: SS  
COUNTY OF CHRISTIAN :

VERIFICATION

We, being property owners on ATXI's proposed alternate route 2 from Pawnee to Pana of Ameren's Illinois Rivers Transmission Project, have read the above and foregoing document, have knowledge of the facts stated herewith states that the matters set forth therein are true in substance and in fact.

  
Justin Ramey and Ann Raynolds  
1236 E 1000 N Road  
Taylorville, Illinois 62568  
217-638-4211  
[ARaynolds6@gmail.com](mailto:ARaynolds6@gmail.com)

SUBSCRIBED AND SWORN to me, a Notary Public, on this 30 day of December, 2013.

  
Notary Public




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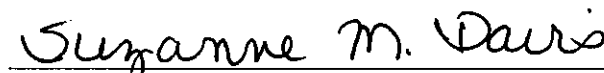
PROOF OF SERVICE

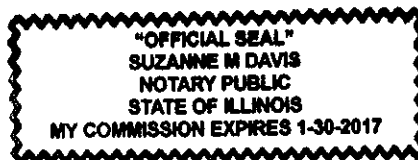
STATE OF ILLINOIS :  
: SS  
COUNTY OF CHRISTIAN :

We, being property owners on ATXI's proposed alternate route 2 from Pawnee to Pana of Ameren's Illinois Rivers Transmission Project, herewith certify that we did on the 30 day of December, 2013, via hand delivery, file with the Illinois Commerce Commission, our initial brief and served same upon the persons identified on the Commission's official service list via hand delivery to the Illinois Commerce Commission.

  
Justin Ramey and Ann Raynolds  
1236 E 1000 N Road  
Taylorville, Illinois 62568  
217-638-4211  
[ARaynolds6@gmail.com](mailto:ARaynolds6@gmail.com)

SUBSCRIBED AND SWORN to me, a Notary Public, on this 30 day of December, 2013.

  
Notary Public



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